

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MOBILE EQUITY CORP.,

Plaintiff,

v.

WALMART INC.,

Defendant.

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Civil Action No. 2:21-cv-126-JRG-RSP

JURY TRIAL DEMANDED

SECOND JOINT MOTION TO EXTEND STAY OF ALL DEADLINES

Plaintiff Mobile Equity Corp. (“MEC”) and Defendant Walmart Inc. (“Walmart”) (collectively “the parties”) respectfully move for a fifteen-day extension, up to and including January 6, 2023, of the stay of all deadlines in this matter. In support of their Motion, the parties respectfully show the court as follows:

On October 24, 2022, the Court granted the parties’ Motion to Stay all Deadline and Notice of Settlement (Dkt. No. 408) and entered an Order staying all deadlines in this case until November 22, 2022 (Dkt. No. 410).

On November 22, 2022, the Court granted the parties’ Joint Motion to Extend Stay of all Deadlines (Dkt. No. 419) and entered an Order staying all deadlines in this case until December 22, 2022 (Dkt. No. 420). The parties continue to work out the settlement agreement but given the holiday season and the schedule complications that arise therefrom, need a short amount of additional time.

To facilitate this finalization of the settlement agreement, MEC and Walmart jointly request a further fifteen-day extension of the current stay of all deadlines, up to and including

January 6, 2023. This extension is not sought for purposes of delay, but rather in the interest of justice and conservation of the Court's and the Parties' resources while the settlement agreement is finalized.

Dated: December 22, 2022

Respectfully submitted,

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***COUNSEL FOR DEFENDANT
WALMART INC.***

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(V). Pursuant to Federal Rule of Civil Procedure 5(d) and Local Rule CV-5(d) and (e), any counsel of record not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email on December 22, 2022.

/s/ William E. Davis, III
William E. Davis, III

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that the foregoing motion is joined in its entirety by Plaintiff Mobile Equity Corp. and Defendant Walmart Inc.

/s/ William E. Davis, III
William E. Davis, III